

EXHIBIT 1

Al Rajhi Bank's Motion to Dismiss
In re Terrorist Attacks on September 11, 2001
Case No. 1:03-md-01570-GBD-SN (S.D.N.Y.)

**COMPARISON OF PLAINTIFFS' ALLEGATIONS
AGAINST AL RAJHI BANK IN THE AMENDED COMPLAINT
WITH THOSE PREVIOUSLY DISMISSED IN MDL 1570
(all emphases added)**

Allegations in Lloyd's First Amended Complaint, ECF No. 56	Corresponding Allegations in Previously Dismissed Actions
<p>Am. Compl. ¶¶ 153-154 [Al Rajhi Family Members]:</p> <p>Al Rajhi Bank is a Saudi Arabia based financial institution focusing on shariah compliant banking and investment products, ...</p> <p>...with over five hundred (500) branch offices within the Kingdom.</p> <p>Founded in 1957 by Suleiman Abdel Aziz al Rajhi and his brother Saleh al Rajhi, Al Rajhi Bank was, at all times material hereto, a family owned enterprise.</p> <p>Suleiman Abdel Aziz al Rajhi was the Chairman, Managing Director, and largest shareholder of Al Rajhi Bank during all times relevant to this action.</p> <p>Saleh Abdulaziz al Rajhi is the eldest brother of Suleiman and has been Chairman of Al Rajhi Bank. Numerous al Rajhi family members have held senior positions in Al Rajhi Bank as well.</p>	<p>Burnett Response to Al Rajhi Bank's Rule 12(e) Request, No. 02-cv-01616 (S.D.N.Y.), ECF No. 266 ("Burnett 12(e) Resp.") ¶¶ 18-19, 79:</p> <p>Al Rajhi Banking and Investment Corporation [or "Al Rajhi"] is a Saudi Joint Stock Company. It was formed and licensed as a commercial bank pursuant to Saudi Royal Decree on June 30, 1987. Its headquarters are in Riyadh, Saudi Arabia.</p> <p>Al Rajhi is one of the leading financial institutions in the Kingdom of Saudi Arabia and one of the largest companies in the Middle East. It provides a range of corporate and personal banking services in Saudi Arabia and has the largest retail branch network in the Kingdom. By the end of 2002, Al Rajhi had 377 branches within the Kingdom and the largest number of ATM machines of any bank in the Kingdom.</p> <p>Al Rajhi is majority owned and controlled by the al-Rajhi Family ("al-Rajhi Family") who derive from it much of their immense wealth. Family members also make up the majority of its board of directors and executive committee.</p> <p>The Chairman, Managing Director and largest stake holder is Sulaiman Abdul Aziz al-Rajhi and ...</p> <p>...one of his brothers, Saleh Abdul Aziz al-Rajhi, has the second largest holding and is also a director.</p>

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	<p style="text-align: center;">* * *</p> <p><i>See also</i> Federal Insurance First Amended Complaint, No. 03-md-01570 (S.D.N.Y.), ECF No. 111 (“Fed. Ins. Compl.”) ¶¶ 276-77.</p>
<p>Am. Compl. ¶¶ 155-157 [Al Rajhi Family Members]:</p> <p>Based on evidence demonstrating that Al Rajhi Bank was one of al Qaeda’s most essential and critical partners in the years preceding 9/11, U.S. national security and counterterrorism officials made the disruption of Al Rajhi Bank’s support for al Qaeda a central focus of their effort to dismantle al Qaeda’s financial and logistical support infrastructure.</p> <p>The nature and scope of the collaboration between Al Rajhi Bank and al Qaeda that prompted the United States to focus on the bank were detailed in a 2003 Report of the Central Intelligence Agency.</p> <p>According to that report:</p> <p>“Al-Rajhi Bank: Conduit for Extremist Finance (S/NF)</p> <p>Islamic extremists have used Al-Rajhi Banking & Investment Corporation (ARABIC) since at least the mid-1990s as a conduit for terrorist transactions, probably because they find the bank’s vast network and adherence to Islamic principles both convenient and ideologically sound. Senior al-Rajhi family members have long supported Islamic extremists and probably know that terrorists use their bank. Reporting indicates that senior al-Rajhi family members control the bank’s most important decisions and that ARABIC’s principal managers answer directly to Sulayman. The al-Rajhis know they are under scrutiny and have moved to conceal their activities from financial regulatory authorities.”</p> <p>The Wall Street Journal (“WSJ”) reviewed the 2003 report, along with other reports authored by the CIA and other U.S. agencies concerning Al Rajhi Bank’s extensive sponsorship of al Qaeda and allied terrorist organizations, and issued a detailed</p>	<p>Pls.’ Summary of Allegations, Facts, and Evidence in Support of Their Theories of Specific Jurisdiction as to National Commercial Bank, No. 03-md-01570 (S.D.N.Y.), ECF No. 2241-7 (“Pls.’ Summary of Allegations as to NCB”) ¶ 55 & Ex. 114 (“Wall Street Journal, Terror Finance: U.S. Tracks Saudi Bank Favored by Extremists, July 27, 2007 and 2003 CIA Report Excerpt”):</p> <p>According to a 2003 CIA report:</p> <p>“Al-Rajhi Bank: Conduit for Extremist Finance (S//NF)</p> <p>Islamic extremists have used Al-Rajhi Banking & Investment Corporation (ARABIC) since at least the mid-1990s as a conduit for terrorist transactions, probably because they find the bank’s vast network and adherence to Islamic principles both convenient and ideologically sound. Senior al-Rajhi family members have long supported Islamic extremists and probably know that terrorists use their bank. Reporting indicates that senior al-Rajhi family members control the bank’s most important decisions and that ARABIC’s principle [sic] managers answer directly to Suleiman. The al-Rajhis know they are under scrutiny and have moved to conceal their activities from financial regulatory authorities.”</p>

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<p>report in 2007 describing the principal findings of U.S. intelligence investigations. <i>See</i> July 26, 2007 Report by Glenn Simpson of the Wall Street Journal, titled U.S. Tracks Saudi Bank Favored By Extremists.</p>	<p><i>See</i> Wall Street Journal, Terror Finance: U.S. Tracks Saudi Bank Favored by Extremists, July 27, 2007, and 2003 CIA Report Excerpt attached hereto as Exhibit 114.</p> <p style="text-align: center;">* * *</p> <p><i>See also</i> Burnett 12(e) Resp. ¶¶ 80-87; Fed. Ins. Compl. ¶¶ 278, 494, 496.</p>
<p>Am. Compl. ¶ 158 [Routine Banking Services]:</p> <p>According to the WSJ, the U.S. intelligence reports confirm that Al Rajhi Bank played a critical role in facilitating the terrorist activities of al Qaeda's integrated charity fronts, and "describe how Al Rajhi Bank has maintained accounts and accepted donations for Saudi charities that the U.S. and other nations have formally designated as fronts for al Qaeda or other terrorist groups." For example, the intelligence reports indicate that Al Rajhi Bank maintained at least twenty-four (24) accounts and handled unusual transactions for the Al Haramain Islamic Foundation, "a charity that Treasury officials say has acted as a front for al Qaeda in 13 countries."</p> <p>The report states that in 2000, a top official from al-Haramain deposited \$130,000 in \$1,000 traveler's checks into an Al Rajhi account in Riyadh. According to a U.S. indictment, the funds were then sent to al-Qaeda fighters in Chechnya. In connection with the resulting federal prosecution of an al Haramain official, the U.S. government issued an administrative subpoena to Al Rajhi Bank, requesting that Al Rajhi Bank produce documents relevant and essential to the prosecution. Al Rajhi Bank refused to comply. <i>See also id.</i>, Ex. A ¶ 159: Detainee Zaid Muhamamd Sa'ad al Husayn (ISN No. 050) left Saudi Arabia for Afghanistan in July 2001 after being inspired by flyers posted by al Haramain.</p>	<p>Fed. Ins. Compl. ¶¶ 258, 278, 281-83:</p> <p>Al Rajhi Bank has, for a period of many years, provided critical financial and logistical support to al Qaida in relation to that terrorist organization's global jihad.</p> <p>Pls.' Summary of Allegations as to NCB, Ex. 114:</p> <p>"Al Rajhi Bank maintained at least 24 accounts and handled unusual transactions for Al-Haramain foundation--a charity that Treasury officials say has acted as a front for al Qaeda in 13 countries--until the Saudi government ordered the charity shut down in late 2004, according to intelligence and law-enforcement reports. The United Nations has designated top officials of Al Haramain foundation as terrorists, and most of its offices now are closed.</p> <p>According to a federal indictment in Oregon, a top Al Haramain official in 2000 carried \$130,000 in \$1,000 traveler's checks from Portland to Riyadh and deposited them with Al Rajhi--funds the indictment says were for the ultimate benefit of al Qaeda fighters in Chechnya."</p> <p>Burnett 12(e) Resp. ¶¶ 44-46:</p> <p>At all relevant times, Al Rajhi maintained and provided services for a large number of bank accounts for Al Haramain Islamic Foundation. Al Rajhi continues the maintenance of Al Haramain's accounts despite the fact that Al Haramain was banned from Kenya in September 1998 as a result of national security concerns following</p>

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<p>According to the U.S. government: “The al Haramayn Foundation (aka Al Haramayn Islamic Foundation (HIF)) is designated as a Tier 1 Non-Governmental Organization (NGO). Tier 1 targets are defined as terrorist groups, especially those with state support, that have demonstrated the intention and the capability to attack United States Persons or interests.”</p>	<p>the 1998 terrorist attacks on the United States embassies in Tanzania and Kenya.</p> <p>Al Rajhi continues to maintain Al Haramain's accounts despite Al Haramain's designation on March 11, 2002 as terrorist organizations by both the United States and Saudi Arabian authorities for its diversion of “charitable funds” to al Qaeda and international terrorism prior to September 11, through its Somalia and Bosnia-Herzegovina branches.</p> <p style="text-align: center;">* * *</p> <p><i>See also</i> Fed. Ins. Compl. ¶¶ 279-80.</p>
<p>Am. Compl. ¶ 159 [Al Rajhi Family Members]:</p> <p>Consistent with Suleiman al Rajhi's inclusion on the Golden Chain, the intelligence reports reviewed in the article also document the longstanding involvement of Suleiman al Rajhi and al Rajhi family members in supporting extremists through purported charities, explaining that ...</p> <p>“Mr. Al Rajhi and family members have been major donors to Islamic charities that are suspected by Western intelligence agencies of funding terrorism, according to CIA reports and federal-court filings by the Justice Department.” <i>See also id.</i> ¶¶ 126, 132, 136.</p>	<p>Burnett 12(e) Resp. ¶ 16:</p> <p>Early in the formation of Al Qaeda, at a time when its objective was global Jihad, warfare and bloodshed envisaging terrorist attacks against “Western” targets, Osama bin Laden received financial support from a group of wealthy donors from the Gulf areas known as the Golden Chain. The list of donors includes Defendants Ibrahim Afandi, Saleh Kamel, Bin Mahfouz, and Al-Rajhi. . . .</p> <p>Pls.’ Summary of Allegations as to NCB, Ex. 114:</p> <p>Mr. Al Rajhi and family members have been major donors to Islamic charities that are suspected by Western intelligence agencies of funding terrorism, according to CIA reports and federal-court filings by the Justice Department.</p> <p style="text-align: center;">* * *</p> <p><i>See also</i> Pls.’ Summary of Allegations as to NCB ¶¶ 80, 83-85; Fed. Ins. Compl. ¶ 494.</p>
<p>Am. Compl. ¶¶ 160-61 [Al Rajhi Family Members; Routine Banking Services]:</p> <p>Confirming the depth of Al Rajhi Bank's commitment to supporting</p>	<p>Pls.’ Summary of Allegations as to NCB, Ex. 114:</p>

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<p>al Qaeda and related terrorist organizations, the “2003 CIA Report claims that a year after Sept. 11, with a spotlight on Islamic charities, Mr. Al Rajhi ordered Al Rajhi Bank’s board ‘to explore financial instruments that would allow the bank’s charitable contributions to avoid official Saudi scrutiny.’”</p> <p>A few weeks earlier, “Mr. Al Rajhi ‘transferred \$1.1 billion to offshore accounts – using commodity swaps and two Lebanese banks – citing a concern that U.S. and Saudi authorities might freeze his assets.’”</p> <p>The 2003 CIA Report also discusses efforts by Suleiman and Saleh al Rajhi to conceal and disguise unusual transfers through purported charities.</p> <p>The report says that Suleiman and Saleh transferred \$4 million to parties in Germany and Pakistan in December 1998 using “a unique computer code to send funds at regular intervals to unspecified recipients, suggesting that they were trying to conceal the transactions and that the money may have been intended for illegitimate ends.”</p>	<p>A 2003 CIA report claims that a year after Sept. 11, with a spotlight on Islamic charities, Mr. Al Rajhi ordered Al Rajhi Bank’s board “to explore financial instruments that would allow the bank’s charitable contributions to avoid official Saudi scrutiny.”</p> <p>A few weeks earlier, the report says, Mr. Al Rajhi “transferred \$1.1 billion to offshore accounts -- using commodity swaps and two Lebanese banks -- citing a concern that U.S. and Saudi authorities might freeze his assets.”</p> <p>The 2003 CIA report tells of efforts by two Al Rajhi brothers to keep some giving secret.</p> <p>It says that Sulaiman and Saleh transferred \$4 million to parties in Germany and Pakistan in December 1998 using “a unique computer code to send funds at regular intervals to unspecified recipients, suggesting they were trying to conceal the transactions and that the money may have been intended for illegitimate ends.”</p> <p style="text-align: center;">* * *</p> <p><i>See also</i> Burnett 12(e) Resp. ¶¶ 86-89; Fed. Ins. Compl. ¶ 281-282.</p>
<p>Am. Compl. ¶¶ 162-164 [Routine Banking Services]:</p> <p>The U.S. investigations also confirmed that al Qaeda and other terrorist organizations had absolute confidence in Al Rajhi Bank’s commitment to their terrorist cause, as reflected by the United States’ finding that extremists “ordered operatives in Afghanistan, Indonesia, Pakistan, Saudi Arabia, Turkey, and Yemen” to use Al Rajhi Bank.</p> <p>Consistent with those directives, U.S. investigations have identified numerous instances in which al Qaeda members used accounts at</p>	<p>Pls.’ Summary of Allegations as to NCB, Ex. 114:</p> <p>The report says extremists “ordered operatives in Afghanistan, Indonesia, Pakistan, Saudi Arabia, Turkey, and Yemen” to use Al Rajhi Bank.</p> <p>Fed. Ins. Compl. ¶¶ 392-93:</p> <p>Spanish investigators have confirmed that the Spanish network sent funds to Mahmoud Darkazanly and Abdul Fattah Zammar, two</p>

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<p>Al Rajhi Bank to fund and facilitate terrorist attacks. For example, money was funneled to the Hamburg, Germany al Qaeda cell through the Al Rajhi Bank to businessmen Mahmoud Darkazanli and Abdul Fattah Zammar, who in turn provided the al Qaeda cell of September 11th hijackers with financial and logistical support.</p> <p>Through Al Rajhi Bank, September 11th hijacker Abdulaziz al Omari received funds into his Al Rajhi Bank Account Nos.: -----6080, ----0061, and Visa Debit Card No. ---- - ---- -5747. Al Omari frequently utilized a credit card drawn on Al Rajhi Bank in the planning of the attacks. On September 7, 2001, four days before the 9/11 attacks, al Omari received a wire transfer from Al Rajhi Bank, Buraidah Branch, Jeddah, Saudi Arabia.</p> <p>Further, Mamduh Mahmud Salim, convicted mastermind of the 1998 embassy bombings in Kenya and Tanzania, was carrying records of an Al Rajhi account when arrested in Germany in 1998.</p>	<p>Syrian born businessmen who had close ties with the German al Qaida cell. According to German officials, Darkazanly belonged to "the most intimate circle of Mohammad Atta."</p> <p>Transfers between the Spanish network, German al Qaida cell, Darkazanly and Zammar were laundered through the Al Rajhi Bank.</p> <p>Burnett 12(e) Resp. ¶ 43:</p> <p>One of the hijackers in the September 11 attack, Abdulaziz al-Omari, who was aboard American Airlines Flight 11, maintained an account with Al Rajhi numbered 162608010366080 and was issued a Visa debit card number 4909-8016-2002-5457. Mohammed Atta, the lead hijacker on flight 11 and leader of the September 11 operation, made a transfer to this Al Rajhi account held by Al Omari. As such, Al Rajhi facilitated, aided, abetted and materially supported terrorists and terrorist activities.</p> <p>Pls.' Summary of Allegations as to NCB, Ex. 114:</p> <p>Mamduh Mahmud Salim, convicted mastermind of the 1998 embassy bombings in Kenya and Tanzania, was carrying records of an Al Rajhi account (number 001424/4) when arrested in Germany in 1998, German police found.</p> <p style="text-align: center;">* * *</p> <p><i>See also</i> Burnett 12(e) Resp. ¶¶ 45-46; Fed. Ins. Compl. ¶ 278.</p>
<p>Am. Compl. ¶ 165 [Routine Banking Services]:</p> <p>U.S. investigations also documented very hands-on dealings between Al Rajhi Bank and terrorists at operational levels. In this regard, the 2003 CIA Report says that Al Rajhi Bank couriers "delivered money to the Indonesian insurgent group Kompak to fund weapons purchases and bomb-making activities."</p>	<p>Pls.' Summary of Allegations as to NCB, Ex. 114:</p> <p>[T]he CIA report says, Al Rajhi Bank couriers "delivered money to the Indonesian insurgent group Kompak to fund weapons purchases and bomb-making activities."</p> <p>Burnett Third Am. Compl., No. 02-cv-01616 (S.D.N.Y.), ECF No. 29</p>

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<p>Kompak is an al Qaeda affiliate, which also received funding through al Haramain Islamic Foundation.</p>	<p>(“Burnett TAC”) ¶ 176:</p> <p>Umar Faruq, senior al Qaeda representative in Southern Asia, confessed that al-Haramain was the main financial mechanism for funding terrorists operations in the region, through its Indonesian office director in Jakarta, Ahmed al-Moudi.</p>
<p>Am. Compl. ¶ 166 [Al Rajhi Family Members]:</p> <p>A separate November 16, 2001 U.S. intelligence memo states that a money courier for Osama bin Laden's second-in-command, Ayman al Zawahiri, traveled on a visa that Al Rajhi Bank had obtained for him.</p> <p>And, when authorities raided the Kenya home of Wadi el Hage, the al Qaeda member who served as Osama bin Laden's personal secretary and is currently serving a life sentence for his role in the embassy bombings, his address book contained personal contact information for Saleh al Rajhi.</p>	<p>Pls.' Summary of Allegations as to NCB, Ex. 114:</p> <p>A U.S. intelligence memo dated Nov. 16, 2001, says a money courier for Osama bin Laden's second-in-command, Ayman al-Zawahiri, traveled on a visa that the bank had obtained for him. The memo adds, however, “Reporting does not indicate whether bank management was witting” of the courier's terrorist connections.</p> <p>Burnett TAC ¶ 86:</p> <p>When the Kenyan house of Osama bin Laden's personal secretary, Wadih el-Hage, was raided in 1997, information regarding Saleh Abdulaziz al-Rajhi was discovered. Wadih el-Hage is a known al Qaeda member who was convicted for the 1998 United States Embassy bombings in Kenya and Tanzania.</p>
<p>Am. Compl. ¶ 167 [Routine Banking Services]:</p> <p>Consistent with the findings of U.S. intelligence agencies, Zacarias Moussaoui, the only al Qaeda member convicted to date for involvement in the September 11th attacks, has testified that Osama bin Laden personally described Al Rajhi Bank to him as “like a good brother.” Moussaoui explained that Al Rajhi Bank was responsible for “moving money around” for al Qaeda, and was one of the main supporters of the Saudi charity fronts used by al Qaeda, including the Al Haramain Islamic Foundation.</p>	<p>Statement Under Oath of Zacarias Moussaoui, Vol. I, No. 03-md-01570 (S.D.N.Y.), ECF No. 2927-5, at 17:17-24:</p> <p>Q What did Shaykh Osama bin Laden say about Al-Rajhi bank?</p> <p>A I know that the discussion we have they were like a good brother, I mean, they were -- they were one -- one of the main support with the Haramain and the High Commission, and -- and the -- the -- the -- and national commission of the financial support and moving -- moving money around, I know this for a fact.</p>

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	<p>Fed. Ins. Compl. ¶¶ 278, 280:</p> <p>Al-Rajhi Rank has served as one al Qaida's preferred banks for many yearsThe accounts maintained by Al Rajhi on behalf of the charities operating within Al Qaida's infrastructure, and in particular accounts it maintained for al Haramain and IIRO, have been used to transfer funds to al Qaida cell, throughout the world.</p> <p style="text-align: center;">* * *</p> <p><i>See also</i> Burnett 12(e) Resp. ¶¶ 26, 29-31, 44, 47, 53, 57; Fed. Ins. Compl. ¶¶ 278, 280.</p>
<p>Am. Compl. ¶¶ 168-72:</p> <p>Faced with a wealth of compelling evidence of Al Rajhi Bank's long-standing material support for al Qaeda, "officials from the National Security Council, CIA, Treasury and State Departments debated a proposal for legal and political action against the bank, including the possibility of covert operations such as interfering with the bank's internal operations," according to the WSJ.</p> <p>U.S. officials further debated designating the bank pursuant to Executive Order 13224, an action that can only occur where persons knowingly "assist in, sponsor, or provide financial, material, or technological support for, or financial or other services to or in support of, such acts of terrorism."</p> <p>Ultimately, U.S. officials chose to seek reforms of the bank via direct negotiations with the Saudi government, and there have since been significant leadership and managerial changes at the bank. Of particular note, Suleiman al Rajhi stepped down as head of the bank and relinquished his control over it.</p>	<p>Pls.' Summary of Allegations as to NCB, Ex. 114:</p> <p>Deputies from the National Security Council, CIA, Treasury and State departments debated a proposal for legal and political action against Al Rajhi Bank, including the possibility of covert operations such as interfering with the bank's internal operations, according to Bush administration documents and former U.S. officials.</p> <p>One idea kicked around was "listing or threatening to list" Al Rajhi Bank as a supporter of terrorism. . . .</p> <p>Ultimately, the Bush administration again chose merely to continue privately exerting pressure on the Saudis to stiffen their oversight.</p> <p>Burnett 12(e) Resp. ¶¶ 73, 75:</p> <p>Al Rajhi is obliged to follow the Accounting Standards for Commercial Banks issued by the Saudi Arabian Monetary Agency ("SAMA") the Central Bank of Saudi Arabia, and the International Accounting Standards ("IAS"). Al Rajhi is regulated and supervised</p>

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<p>U.S. State Department diplomatic cables confirm the urgency and gravity of the engagements between U.S. officials and their Saudi counter-parts concerning Al Rajhi Bank's sponsorship of al Qaeda.</p> <p>The cables indicate that U.S. officials conveyed their "real concerns about the financial activities facilitated by Al-Rajhi" to senior Saudi officials, and sought unprecedented reform at Al Rajhi Bank in the years following the September 11th attacks.</p> <p>According to a September 27, 2004 cable titled "Terrorist Financing: Al-Rajhi Bank," Treasury Assistant Secretary Juan Zarate met with Saudi banking officials and explained that the United States needs "to be assured that Al-Rajhi is doing everything possible regarding compliance and cooperation. Particular accounts of concern need to be investigated and the bank's compliance structure needs to be reviewed."</p> <p>After U.S. officials "provided the Saudi government with information documenting specific instances of terrorists using the Al Rajhi Bank, including information about specific accounts and transactions of interest," Saudi Arabia agreed to conduct a joint review with Treasury Department officials "to ensure the institution is not operating in a way that provides safe haven for the financial transactions of terrorists and their supporters."</p> <p>A November 25, 2004 diplomatic cable titled "Joint Examination of Al Rajhi Bank Through the Joint Terrorist Financing Task Force," bluntly explains the reason underlying the diplomatic engagements with the Saudis concerning the bank, confirming that Al Rajhi Bank had been "used by al Qaida and like-minded terrorist groups."</p>	<p>by SAMA. Since 1999, it has been required to cooperate with SAMA concerning investigations into terrorist financing.</p> <p>In 1999, William Weschler of the National Security Council and Richard Newcomb of the Office of Foreign Assets Control (OFAC) traveled to Saudi Arabia to specifically warn SAMA and Al Rajhi that their financial systems were being manipulated or utilized to fund terrorist organizations such as Al Qaeda.</p> <p>In addition, FATF, the U.S. Treasury Department and a number of other international financial bodies specifically warned SAMA and other officials within the government of Saudi Arabia that they must adopt "know your customer" and anti-money laundering and anti-terrorist financing regulations and to comply with FATF's other provisions.</p> <p>Burnett 12(e) Resp. ¶ 75:</p> <p>In 1999, William Weschler of the National Security Council and Richard Newcomb of the Office of Foreign Assets Control (OFAC) traveled to Saudi Arabia to specifically warn SAMA and Al Rajhi that their financial systems were being manipulated or utilized to fund terrorist organizations such as Al Qaeda.</p> <p>Fed. Ins. Compl. ¶ 280:</p> <p>The accounts maintained by Al Rajhi on behalf of the charities operating within al Qaida's infrastructure, and in particular accounts it maintained for al Haramain and IIRO, have been used to transfer funds to al Qaida cells throughout the world.</p>

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<p>Am. Compl. ¶¶ 173-74 [Routine Banking Services, Charitable Donations]:</p> <p>Separate evidence reveals that Al Rajhi Bank both funded and provided financial services to virtually all of al Qaeda's most critical charity fronts, including the Muslim World League ("MWL"), International Islamic Relief Organization ("IIRO"), World Assembly of Muslim Youth ("WAMY"), Benevolence International Foundation ("BIF"), Al Haramain Islamic Foundation, and the Saudi High Commission for Relief of Bosnia & Herzegovina ("SHC"), among others.</p> <p>In addition to maintaining accounts and facilitating transactions for those organizations, Al Rajhi Bank advertised the existence and numerical designation of the accounts it maintained for those charities throughout the Muslim world, thereby assisting them in their fundraising activities.</p> <p>In addition, Al Rajhi Bank contributed its own zakat and haram funds to these and other al Qaeda fronts.</p>	<p>Fed. Ins. Compl. ¶¶ 278-279:</p> <p>Al-Rajhi Bank has served as one al Qaida's preferred banks for many years, maintaining accounts for many of the charity defendants that operate within al Qaida's infrastructure, including the IIRO, MWL, WAMY, BIF, and Al Haramain, among others.</p> <p>In cooperation with the charities operating within al Qaida's infrastructure, Al Rajhi Bank advertises the existence and numerical designations of the accounts it maintains for those charities throughout the Muslim world, and provides a mechanism to allow al Qaida's supporters to deposit funds directly into those accounts. Through this mechanism. Al Rajhi Bank facilitates al Qaida's fundraising efforts.</p> <p>Burnett 12(e) Resp. ¶¶ 29, 31:</p> <p>In addition, Al Rajhi has its own Haram obligation that must be calculated and subsequently donated to charity. Rather than provide charity directly to the needy, Al Rajhi satisfied, and continues to satisfy, its Haram obligation by donating to charities of its own choosing. The charities, in theory, are to disburse the money to the needy. The charities to which Al Rajhi has contributed in order to satisfy its Haram obligation include, among others, Al Haramain, IIRO, Muslim World League, WAMY, and Saudi Joint Relief Committee. These charities cannot function without the support of banks, including Al Rajhi. . . .</p> <p>The charities selected by Al Rajhi's Zakat department to receive [its own and its investors' and depositors'] donations include, among others, Al Haramain, IIRO, Muslim World League, WAMY, and Saudi Joint Relief Committee.</p>

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<p>At all times relevant, Al Rajhi Bank and the al Rajhi family members, including Suleiman al Rajhi, were expressly aware that the charities for which Al Rajhi Bank provided financial services and funding were al Qaeda fronts, and that the bank was being used as a vehicle for laundering funds on behalf of, and transferring funds to, that terrorist organization.</p> <p>Nevertheless, Al Rajhi Bank continued to maintain those accounts and to directly fund the charities.</p>	<p>Al Rajhi knew or had to know that the funds that it collected for and distributed to Al Haramain, IIRO, Muslim World League, WAMY, Saudi Joint Relief Committee and other charities materially supported, aided and abetted Al Qaeda, international terrorists and their activities.</p> <p>Fed. Ins. Compl. ¶¶ 281-82:</p> <p>Al Rajhi Bank has long known that the accounts it maintained for many ostensible charities were being used to solicit and transfer funds for terrorist organizations, including al Qaida. In fact, Suleiman Abdul Aziz Al Rajhi directly participates in the management, funding, and operations of several of those charities, including the MWL and IIRO. Through his involvement in the affairs of those charities, Al Rajhi has known, for a period of many years, of their extensive sponsorship of al Qaida's operations, and consequently that the accounts maintained by Al Rajhi Bank on behalf of those organizations were being used to channel funds to al Qaida.</p> <p>Despite this knowledge, Al Rajhi Bank has continued to maintain those accounts.</p> <p style="text-align: center;">* * *</p> <p><i>See also</i> Burnett 12(e) Resp. ¶¶ 6, 26, 29, 34-42, 44-60, 70, 86-87; Fed. Ins. Compl. ¶¶ 278-79.</p>
<p>Am. Compl. ¶¶ 175-82 [Routine Banking Services]:</p> <p>The intimacy of Al Rajhi Bank's collaboration with al Qaeda's integrated charity arms in furtherance of al Qaeda's terrorist activities, and the bank's specific intent that its services and funding on behalf of those charities would be used by al Qaeda to attack the United States, is illustrated by the relationships and course of dealings among Al Rajhi Bank, Suleiman al Rajhi, and the IIRO.</p> <p>According to a U.S. State Department diplomatic cable, "Usama bin Ladin used the entire IIRO network for his terrorist</p>	<p>Burnett TAC ¶ 247:</p> <p>The United States Department of State has also identified IIRO as an organization which sponsors terrorism.</p>

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<p>activities.”</p> <p>As further reflected by the factual allegations as to the IIRO set forth in Exhibit A, the IIRO worked hand-in-glove with al Qaeda on both financial and operational levels throughout the world, ...</p> <p>...and was repeatedly implicated in terrorist activities in the years preceding the September 11th attacks.</p> <p>Numerous IIRO offices were raided in connection with al Qaeda related terrorism investigations prior to 9/11, and several IIRO branches were closed as a result of those investigations. These actions against the IIRO were closely monitored by IIRO's senior leadership in Saudi Arabia, and widely reported in media in Saudi Arabia and in the countries where the actions took place. Meanwhile, internal financial reporting within the IIRO confirmed extensive financial irregularities and diversions within its global offices.</p> <p>Throughout the period during which the IIRO was repeatedly implicated in terrorist activities, Al Rajhi Bank maintained numerous accounts for the IIRO, providing a full complement of financial services with respect to those accounts, ...</p>	<p>Fed. Ins. Compl. ¶ 133:</p> <p>The IIRO has long operated as a fully integrated component of Qaida's logistical and financial support infrastructure, and provided material support and resources to al Qaida and affiliated FTOs.</p> <p>Burnett TAC ¶ 234:</p> <p>IIRO was involved with the 1993 World Trade Center bombing, the plot to destroy the Lincoln Tunnel and the Brooklyn Bridge, the plot to assassinate former President William Jefferson Clinton and Pope John Paul II, the plot to blow up twelve American airplanes simultaneously, and the 1998 Embassy bombings in East Africa.</p> <p>Fed. Ins. Compl.:</p> <p>[Allegedly describing investigations and Al Qaida links of IIRO's "Zagreb office" (¶ 138), "its offices in Kenya" (¶ 139), "IIRO's Bosnia office" (¶ 143), "IIRO in Pakistan" (¶ 144), "IIRO's Canadian office" (¶ 145), and "a US branch" (¶ 146).]</p> <p>Burnett 12(e) Resp. ¶¶ 53-54:</p> <p>At all relevant times, Al Rajhi maintained accounts and provided services to IIRO, including account number 77700.</p>

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<p>...while also working with the IIRO to solicit donations to those accounts. In certain cases, Al Rajhi Bank and the IIRO made little effort to hide the fact that donations to those accounts would be used to support terrorist activities. For instance, Al Rajhi Bank handled IIRO "charitable" contributions intended to benefit suicide bombers by directing Al Igatha (IIRO) Journal advertisements toward needs in Somalia, Sri Lanka, India, and the Philippines under IIRO Account No. ----- for "the action most loved by Allah." Al Rajhi Bank also collected charitable donations on behalf of Sanabel al Kheer ("Seeds of Charity"), the financial/investment arm of the IIRO, depositing the donations into Sanabel's Al Rajhi Bank Account No. -----.</p> <p>Sanabel al Kheer, which the IIRO owns and controls, was established to make investments to support the IIRO's charitable operations. Like the IIRO, Sanabel al Kheer was repeatedly implicated in terrorist activities in the years prior to 9/11 as well. Of particular note, an FBI investigation implicated the U.S. arm of Sanabel al Kheer in the financing of the African embassy bombing attacks.</p> <p>Meanwhile, several senior Al Rajhi Bank officials were simultaneously serving as senior officials of the IIRO and/or Sanabel. Most notably, Suleiman al Rajhi served on the Executive Council of the IIRO, along with several other members of the Golden Chain. Suleiman al Rajhi also served on the Board of Trustees of Sanabel, Inc., the U.S.-based arm of Sanabel al Kheer, again along with another member of the Golden Chain. Thus, Suleiman al Rajhi was simultaneously the head of Al Rajhi Bank, and a senior official of several of the very al Qaeda charity fronts extensively sponsored and supported by Al Rajhi Bank.</p>	<p>In addition, the Saudi Embassy website in 2000 reported in a press release that IIRO was launching a campaign to assist Palestinians. Specifically, IIRO called for the payment of \$1,000 for the family of each "martyr." The press release also reported that an account was set up at Al Rajhi to accept funds. (http://www.saudiembassy.nellpressrelease/DOspailO-12-mideast.html)</p> <p>Al Rajhi oversees and facilitates the donations to IIRO by providing account services for that express purpose and by allowing IIRO to advertise both the existence of the account and its banking relationship with Al Rajhi.</p> <p>Burnett TAC ¶ 247:</p> <p>Sanabil al-Khair was created to manage the International Islamic Relief Organization's financial assets. IIRO's website states, "It [IIRO] has established an endowment fund (Sanabil Al-Khair) which will be used to generate a stable income to finance its various activities." The Sanabil al-Khair has incorporated in the United States under two different names: The Sana-Bell, Inc. and Sanabel al-Kheer, Inc. Their corporate records indicate the same address as IIRO in Herndon, Virginia.</p> <p>Burnett 12(e) Resp. ¶¶ 85-86:</p> <p>In 1998, Sulaiman Abdul Aziz Al Rajhi was on the executive council of IIRO with Ibrahim Afandi. In 1989, Sulaiman Saleh Al Rajhi was on the Board of Trustees of Sanabel Inc. (a company registered in the District of Columbia) with Ibrahim Afandi and Saleh Kamel and the same three persons that incorporated Sanabel al-Kheer, the investment arm of IIRO based at 555 Grove Street, Herndon, Virginia. Yacub Mirza, an officer of the SAAR Foundation, was another Trustee on the board of Sanabel, Inc. and in 2002, together with an al-Rajhi Family</p>

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<p>By virtue of the leadership positions held by Al Rajhi Bank officials within the IIRO and Sanabel al Kheer, including most notably those held by Suleiman al Rajhi himself, those Al Rajhi Bank officials received express and repeated notifications of the pervasive involvement of the IIRO and its affiliates in supporting al Qaeda and terrorist activities. Indeed, in addition to the widespread public reporting concerning the terrorism investigations of the various IIRO offices, those investigations were closely monitored by IIRO leadership in Saudi Arabia, including by the members of the IIRO Executive Committee.</p> <p>In the face of this information, Al Rajhi Bank continued to provide funding and a broad range of financial services to the IIRO and Sanabel al Kheer, with an express awareness that those entities were deeply integrated into al Qaeda's infrastructure, and using the services and funding provided by Al Rajhi Bank to advance al Qaeda's efforts to attack the United States.</p>	<p>employee, Abdullah Al Obaid, was an executive of Sana bel al-Kheer.</p> <p>Al Rajhi Banking and Investment, by and through the al-Rajhi Family which owns and controls it, has extensive dealings and connections with individuals and organizations linked, or reasonably believed to have links to international terrorism. Given the nature and extent of these links, it is alleged that Al Rajhi has knowingly or materially provided or channeled funds for terrorist-related activity and/or has intentionally, recklessly or negligently allowed itself to be used to facilitate the funding of such activities.</p> <p>Fed. Ins. Compl. ¶ 133:</p> <p>Al Rajhi Bank has long known that the accounts it maintained for many ostensible charities were being used to solicit and transfer funds to terrorist organizations, including al Qaida....</p> <p>Despite this knowledge, Al Rajhi Bank has continued to maintain those accounts. In doing so, Al Rajhi knowingly provided financial services and other forms of material support to al Qaida.</p> <p style="text-align: center;">* * *</p> <p><i>See also</i> Fed. Ins. Compl. ¶¶ 130-49; Burnett TAC ¶¶ 234-248.</p>
<p>Am. Compl. ¶ 183 [Charitable Donations]:</p> <p>Al Rajhi Bank was generous in its support of other of al Qaeda's charity arms as well, providing not only financial services but significant funding as well. Al Rajhi Bank's own contributions to al Qaeda charities included: a 1994 \$533,333 donation to the Saudi High Commission ("SHC"); a 1995 \$400,000 donation to the SHC; and an \$80,000 donation to the SHC in 1996; while collecting donations for Bosnia.</p>	<p>Burnett 12(e) Resp. ¶¶ 26, 29:</p> <p>As a Saudi Arabian entity, Al Rajhi has its own Zakat obligation. Each year, it is obligated to donate 2.5% of its current assets and other items to recipients who fall within one of the categories for almsgiving set forth in the Quran. Rather than provide charity directly to the poor or needy, Al Rajhi satisfied, and continues to satisfy, its Zakat obligation by donating to charities of its own choosing for disbursement. The charities are then to disburse the money. The charities to which Al Rajhi has contributed or</p>

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	<p>otherwise supported in this fashion include, among others, Al Haramain, IIRO, Muslim World League, WAMY, and the Saudi Joint Relief Committee. These charities and the individuals they sponsor cannot function or operate without the support of banks, including Al Rajhi.</p> <p>...</p> <p>In addition, Al Rajhi has its own Haram obligation that must be calculated and subsequently donated to charity. Rather than provide charity directly to the needy, Al Rajhi satisfied, and continues to satisfy, its Haram obligation by donating to charities of its own choosing. The charities, in theory, are to disburse the money to the needy. The charities to which Al Rajhi has contributed in order to satisfy its Haram obligation include, among others, Al Haramain, IIRO, Muslim World League, WAMY, and Saudi Joint Relief Committee. These charities cannot function without the support of banks, including Al Rajhi.</p>
<p>Am. Compl. ¶¶ 184-86 [Al Rajhi Family Members]:</p> <p>The evidence concerning Al Rajhi Bank's sponsorship of al Qaeda through multiple platforms under the direction of Suleiman al Rajhi is, in turn, simply part of a far broader mosaic of evidence demonstrating Suleiman al Rajhi's pervasive ties to terrorism, unwavering dedication to al Qaeda's terrorist agenda, and extensive use of organizations under his control to support al Qaeda and affiliated terrorist organizations.</p> <p>For example, Suleiman al Rajhi established, founded, financed, and was the namesake of the SAAR network of "charities" and front groups organized at 555 Grove Street in Herndon, Virginia.</p>	<p>Burnett TAC ¶ 86:</p> <p>Defendant Sulaiman Abdul Aziz al-Rajhi has a history of financially supporting al Qaeda terrorists. Sulaiman Abdul Aziz al-Rajhi managed the National Commercial Bank budget of the Saudi Joint Relief Committee. The al-Rajhi family is also the primary financier of the SAAR Foundation Network and, as such, is implicated by the SAAR Network's sponsorship of terrorism and Osama bin Laden.</p> <p>Burnett 12(e) Resp. ¶¶ 80-84:</p> <p>The al-Rajhi Family is the biggest donor to the SAAR Foundation. SAAR is an acronym for Sulaiman Abdul Aziz al-Rajhi. The SAAR organization was incorporated in Herndon, Virginia as a non-profit organization on July 29, 1983 and voluntarily dissolved on December 28, 2000. It was incorporated at 555 Grove Street, Herndon, Virginia....</p>

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<p>Until its dissolution, the SAAR Network was comprised of over 100 entities at this single address, with overlapping officers and directors set up to launder money to al Qaeda and international terrorism. According to the Department of Defense, “the SAAR network includes more than 100 Muslim think tanks, charities and companies. The al-Rajhi family utilized SAAR to fund Islamic extremist organizations and has ties to al Qaida.”</p> <p>In March 2002, the entities comprising the SAAR network were raided under a federal search warrant by the U.S. Treasury Department. Known as Operation Green Quest, federal authorities were looking for “potential money laundering and tax evasion activities and their ties to terrorist groups such as . . . al Qaeda as well as individual terrorists . . . (including Osama bin Laden).” Authorities said that the probe of the Herndon groups was the largest federal investigation of terrorism financing in the world. An affidavit from Homeland Security agent David Kane said that the SAAR network in Herndon had sent more than \$26 million in untraceable money overseas and that the leaders of the organization “have committed and conspired to . . . provide material support to foreign terrorist organizations.”</p>	<p>Virginia Secretary of State corporate records indicate that a network of more than 100 intricately-linked and mutually-supporting organizations were based with the SAAR Foundation at 555 Grove Street. The organizations at 555 Grove Street had intertwining and constantly changing directorships, with the same individuals serving as executives on the boards of a number of companies. These organizations are known or reasonably suspected terrorist organizations. The SAAR Foundation was at the center of this network with its operators performing multiple roles within the network.</p> <p>The stated purpose of the SAAR Foundation was to fund anti-hunger, educational and technological projects in developing Islamic countries.</p> <p>....</p> <p>[O]n March 21st and 22nd, 2002, 555 Grove Street was raided by Special Agents supporting Operation Green Quest along with other addresses linked to the network and its officers. Search warrants were applied for and issued by the District Court of the Eastern District of Virginia on the basis of evidence presented to it by Operation Green Quest.</p> <p>Fed. Ins. Compl. ¶ 226:</p> <p>The entities operating within the SAAR Network have long acted as fully integrated components of al Qaida's logistical and financial support infrastructure, and provided material support and resources to al Qaida and affiliated FTOs.</p> <p style="text-align: center;">* * *</p> <p><i>See also</i> Fed. Ins. Compl. ¶¶ 222-232, 277.</p>

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<p>Am. Compl. ¶¶ 187-88 [Al Rajhi Family Members]:</p> <p>Suleiman al Rajhi also was a member of the board of directors of Akida Bank in the Bahamas, a Specially Designated Global Terrorist (“SDGT”) entity pursuant to Executive Order 13224. Akida Bank was run by Youssef Nada, a noted terrorist financier, with whom Suleiman al Rajhi had a close and longstanding relationship.</p> <p>Suleiman al Rajhi also enjoyed a long and ongoing relationship with Ahmed Idris Nasreddin, yet another SDGT. Nasreddin and Nada are both founders and directors of Bank al Taqwa, itself a SDGT that operated from the Bahamas. According to the U.S. Treasury Department, “Usama bin Laden and his al-Qaida organization received financial assistance from Youssef Nada. Al Taqwa provides investment advice and cash transfer mechanisms for al Qaida and other radical Islamic groups.”</p>	<p>Burnett TAC ¶ 136:</p> <p>Youssef M. Nada, one of the terrorist designated Bank al-Taqwa executives, employed the al Qaeda financier and Defendant, Sulaiman Abdul Aziz al-Rajhi. Sulaiman Abdul Aziz al-Rajhi worked for Youssef M. Nada at the Akida Bank in the Bahamas, which has also been designated for providing financial support to al Qaeda.</p> <p>Id. ¶ 132:</p> <p>Ahmed Idris Nasreddin (or “Nasreddin”), an officer at Bank al-Taqwa, was designated as a terrorist on April 19, 2002, for his role in financially supporting al Qaeda.</p> <p>Fed. Ins. Compl. ¶¶ 259, 262, 267:</p> <p>Bank Al Taqwa was established in 1988 by defendants Youssef Mustafa Nada and Ahmed Idris Nasreddin....</p> <p>Defendants Nada and Nasreddin also maintained controlling interests in the Akida Bank.</p> <p>The corporations and organizations controlled by Nada and Nasreddin are deeply intertwined, and have long provided financial services and other forms of material support to al Qaida.</p> <p style="text-align: center;">* * *</p> <p><i>See also</i> Fed. Ins. Compl. ¶¶ 263-66.</p>
<p>Am. Compl. ¶¶ 189 [Al Rajhi Family Members]:</p> <p>Suleiman al Rajhi also managed the National Commercial Bank budget of the Saudi Joint Relief Committee for Kosovo and Chechnya (“SJRC”).</p>	<p>Burnett TAC ¶ 86:</p> <p>Defendant Sulaiman Abdul Aziz al-Rajhi has a history of financially supporting al Qaeda terrorists. Sulaiman Abdul Aziz al-Rajhi managed the National Commercial Bank budget of the Saudi Joint Relief Committee.</p>

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	<p>Fed. Ins. Compl. ¶ 290:</p> <p>Under the supervision of Suleiman Abdul Aziz al-Rajhi, National Commercial Bank also managed the budget of SJRC.</p> <p><i>See also</i> Pls.' Summary of Allegations as to NCB, Ex. 114; Burnett 12(e) Resp. ¶¶ 57-60.</p>
<p>Am. Compl. ¶¶ 190-92 [Al Rajhi Family Members; Charitable Donations]:</p> <p>Suleiman al Rajhi and members of the al Rajhi family also used Al Rajhi Bank to transfer large sums to the Third World Relief Agency ("TWRA"), a purported charitable organization that became an integral component of al Qaeda's support infrastructure. In particular, a U.N. sponsored audit of the TWRA's financial and administrative records uncovered two (2) transfers of money totaling \$53,287.70 sent by "Sulaiman Al Rajhi" to the TWRA account in June and July of 1993, and three (3) transfers totaling \$155,894.28 to the TWRA by "Saleh Alabdulaziz Alrajhi and Brothers" in 1993 and 1994. The 9/11 Commission found that Osama bin Laden used the TWRA to covertly provide support for terrorist activities.</p> <p>In 2013 the United States Senate Permanent Subcommittee on Investigations issued a report entitled U.S. Vulnerabilities to Money Laundering, Drugs, and Terrorist Financing, in which it surveyed much of the foregoing evidence concerning Al Rajhi Bank's terrorist connections. Succinctly describing the import of the various, independent sources of evidence and connections to terrorism, the report states: "Taken together, the information – the Al Qaeda Golden Chain document, the 2002 search of Al Rajhi-related entities in Virginia, the 2003 CIA report, the 2005 al Haramain Foundation indictment and trial, the 2007 media reports, the 2010 refusal to provide bank documents in a terrorist-financing trial, and the multiple links to suspect banks and accountholders – present an</p>	<p>Burnett TAC ¶ 86:</p> <p>Defendant Sulaiman Abdul Aziz al-Rajhi has a history of financially supporting al Qaeda terrorists.</p> <p>Burnett 12(e) Resp. ¶ 16:</p> <p>Early in the formation of Al Qaeda, at a time when its objective was global Jihad, warfare and bloodshed envisaging terrorist attacks against "Western" targets, Osama bin Laden received financial support from a group of wealthy donors from the Gulf areas known as the Golden Chain. The list of donors includes Defendants ... Al-Rajhi.</p> <p>Burnett 12(e) Resp. ¶ 83:</p> <p>Al Rajhi Banking and Investment, by and through the al-Rajhi Family which owns and controls it, has extensive dealings and connections with individuals and organizations linked, or reasonably believed to have links to international terrorism. Given the nature and extent of these links, it is alleged that Al Rajhi has knowingly or materially provided or channeled funds for terrorist-related activity and/or has intentionally, recklessly or negligently allowed itself to be used to facilitate the funding of such activities.</p>

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<p>unusual array of troubling allegations about a particular financial institution.”</p> <p>As reflected by the above and confirmed by U.S. investigations, a broad spectrum of evidence demonstrates that Suleiman al Rajhi was not merely a critical individual donor to al Qaeda, but an active architect and manager of al Qaeda's global financial and logistical support network, who, along with others, actively deployed Al Rajhi Bank's resources to advance al Qaeda's continuous efforts to attack the United States.</p> <p>The support and services Al Rajhi Bank provided to al Qaeda were essential to the development and maintenance of the infrastructure employed by al Qaeda to carry out the September 11th attacks, and designed to assist al Qaeda in attacking the United States.</p>	<p>Fed. Ins. Compl. ¶¶ 258, 278, 281-83:</p> <p>Absent the material support and sponsorship of the banks operating within its infrastructure, as further detailed herein, al Qaida would have remained a regional extremist organization incapable of conducting large scale terrorist attacks on a global scale....</p> <p>Al-Rajhi Rank has served as one al Qaida's preferred banks for many years maintaining accounts for many of the charity defendants that operate within al Qaida's infrastructure....</p> <p>Suleiman Abdul Aziz Al Rajhi directly participates in the management, funding, and operations of several of those charities, including the MWL and IIRO. Through his involvement in the affairs of those charities, Al Rajhi has known, for a period of many years, of their extensive sponsorship of al Qaida's operations, and consequently that the accounts maintained by Al Rajhi Bank on behalf of those organizations were being used to channel funds to al Qaida.</p> <p>Despite this knowledge, Ai Rajhi Bank has continued to maintain those accounts. In doing so, Al Rajhi knowingly provided financial services and other forms of material support to al Qaida.</p> <p>As the forgoing demonstrates, Al Rajhi Bank has, for a period of many years, provided critical financial and logistical support to al Qaida in relation to that terrorist organization's global jihad.</p> <p>The September 11th attack was a direct, intended, and foreseeable product of Al Rajhi Bank's participation in al Qaida's jihadist campaign.</p> <p style="text-align: center;">* * *</p> <p><i>See also</i> Pls.' Summary of Allegations as to NCB, Ex. 114; Fed. Ins. Compl. ¶¶ 280, 494-96.</p>